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10 Attorneys for Defendant  
11 WARREN PUMPS, LLC

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA

14 Donald Cantlin, Jr.,

15 No. CV 08 0982 JCS

16 Plaintiff,

17 **DEFENDANT WARREN PUMPS, LLC'S  
18 NOTICE OF TAG-ALONG ACTION**

19 v.

20 General Electric Company, Cramp  
21 Shipbuilding and Drydock Company,  
22 and Warren Pumps, LLC,

23 Defendants.

24 PLEASE TAKE NOTICE THAT on July 29, 1991, the Judicial Panel on  
25 Multidistrict Litigation entered an order transferring all asbestos cases pending in federal  
26 court to the United States District Court, Eastern District of Pennsylvania, for coordinated  
27 or consolidated pretrial proceedings pursuant to U.S.C. § 1407 ("MDL Transfer Order").  
That order also applies to "tag-along actions," or actions involving common questions of  
fact filed after the January 1991 filings of the Panel's Order to Show Cause. MDL Rule  
13(e) provides:

28 Any party or counsel in actions previously transferred under section  
29 1407 or under consideration by the Panel for transfer under section  
30 1407 shall promptly notify the Clerk of the Panel of any potential  
31 "tag-along actions" in which that party is also named or in which  
32 that counsel appears.

The undersigned hereby notifies the court that this is a potential “tag-along action” which may be subject to transfer to the Eastern District of Pennsylvania. The Clerk of the Panel may either: 1) enter a conditional transfer order pursuant to MDL Rule 12(a), or 2) file an order to show cause why the action should not be transferred, pursuant to MDL Rule 13(b).

Dated: April 3, 2008

## CARROLL, BURDICK & McDONOUGH LLP

By John G. Lee  
John G. Lee  
Attorneys for Defendant  
WARREN PUMPS, LLC

1      *Donald Cantlin, Jr. v. General Electric Company, et al.*  
2      United States District Court,  
2      Northern District of California Action No. CV 08 0982 JCS

3                   **PROOF OF SERVICE BY ELECTRONIC TRANSMISSION**

4                    I, the undersigned, declare: that I am, and was at the time of service of the  
5                    documents herein referred to, over the age of 18 years, and am not a party to the action;  
6                    and I am employed in the County of San Francisco, California. My business address is 44  
6                    Montgomery Street, Suite 400, San Francisco, California 94104.

7                    On the date executed below, I electronically served the document(s) described  
8                    as:

8                    **DEFENDANT WARREN PUMPS, LLC's NOTICE OF TAG-ALONG ACTION**

9                    on recipients designated on the United States District Court, Northern District of  
10                   California's website.

11                  I declare under penalty of perjury pursuant to the laws of the State of  
12                  California, that the foregoing is true and correct, and was executed on April 3, 2008 at San  
12                  Francisco, California.

13                    
14                  Margaret Foley